

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

ROBERT DUPEE, individually, and on behalf
of all others similarly situated,

Plaintiff,

v.

PLAYTIKA SANTA MONICA, LLC a
Nevada limited liability company, and
CAESARS INTERACTIVE
ENTERTAINMENT, INC., a Delaware
corporation,

Defendants.

Case No. 15-cv-01021

**CONSENT MOTION TO EXTEND BRIEFING SCHEDULE
ON DEFENDANTS' MOTION TO DISMISS**

Plaintiff Robert Dupee (“Plaintiff”), by and through his undersigned counsel, pursuant to Federal Rule of Civil Procedure 6, and with Defendants Caesars Interactive Entertainment, Inc.’s and Playtika Santa Monica, LLC’s (“Defendants”) consent, hereby respectfully moves the Court to enter an Order extending the current briefing schedule on Defendants’ pending motion to dismiss (the “Motion”) by approximately one (1) week.

On August 7, 2015, the Court set the current briefing schedule on Defendants’ Motion, such that Plaintiff’s opposition was due no later than September 2nd and Defendants’ reply in support of the motion was due no later than September 25th. (*See* dkt. 11.) Notwithstanding and in light of a professional obligation that arose for Plaintiff’s lead counsel,¹ Plaintiff has requested (and Defendants agreed, subject to the

¹ Specifically, Plaintiff’s lead counsel, Mr. Richman, was required to travel last week from Miami, Florida—where he had another professional engagement—to Los Angeles, California to fill-in for another attorney at the deposition of a putative class representative in another class action matter. Although, Mr. Richman attempted to avoid

Court's approval) an extension of less than one week on his response deadline, such that his opposition papers would be due no later than Tuesday, September 8, 2015. Plaintiff respectfully states that he is aware that the Court has already extended the requested deadline, and he does not take lightly his responsibility to finalize and file his opposition papers as quickly and efficiently as possible. It is with that in mind that he requested just six (6) additional days—three (3) additional business days—to finalize and file his opposition, and he will not seek any further extensions in this regard.

Further, in light of Defendants' willingness to extend such a courtesy and the fact that Plaintiff's opposition deadline would be extended based upon the instant motion, Plaintiff has agreed (again, subject to the Court's approval) to the continuance of Defendants' reply deadline, such that their reply papers would be due no later than Friday, October 2, 2015.

The requested extension will not alter any other deadlines previously set by the Court and is not sought for any improper purpose, such as delay.

WHEREFORE, Plaintiff, with consent from Defendants, respectfully requests that the Court enter an order (i) granting the instant motion, (ii) extending Plaintiff's deadline to oppose Defendants' Motion to September 8, 2015 and extending Defendants' deadline to file a reply in support of their Motion to October 2, 2015, and (iii) awarding such other and further relief as the Court deems reasonable and just.

the need to seek any extension from this Court, the unexpectedly extended travel and time necessary to prepare for the deposition ultimately proved to limit counsel's ability to prepare, review and finalize for filing Plaintiff's opposition papers as originally anticipated.

Respectfully Submitted,

ROBERT DUPREE, individually and on
behalf of all others similarly situated,

Dated: September 2, 2015

By: /s/ Benjamin H. Richman
One of Plaintiff's Attorneys

Jason R. Bristol (0072989)
jbristol@crklaw.com
Joshua B. Fuchs (0087066)
jfuchs@crklaw.com
Joshua R. Cohen (0032368)
jcohen@crklaw.com
The Hoyt Block Building – Suite 400
700 West St. Clair Avenue
Cleveland, Ohio 44113
Tel: 216.781.7956
Fax: 216.781.8061

Rafey S. Balabanian*
rbalabanian@edelson.com
Benjamin H. Richman (*Pro Hac Vice*)
brichman@edelson.com
Courtney C. Booth (*Pro Hac Vice*)
cbooth@edelson.com
EDELSON PC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378

* *Pro Hac Vice Admission to be Sought*

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2015, I caused to be served the above and foregoing document by causing a true and accurate copy of such paper to be filed and served on all counsel of record via the court's CM/ECF electronic filing system, on this the 2nd day of September 2015.

/s/ Benjamin H. Richman
